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October 5, 2015

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.
Case No. 09-50026 (REG)**

Letter Regarding Update on Related Proceedings

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Your Honor’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM. Specifically,

1. On October 1, 2015, pursuant to Judge Furman’s Order No. 81 ¶ 2 (MDL Docket No. 1404),¹ counsel for New GM filed a letter (“**October 1 Letter**”) in MDL 2543 to apprise the District Court of New GM’s position with respect to motions filed in MDL 2543 by the *Brown, Dowling, Fobbs, Gregory, Hoskins, Keeler, Lelonek, Modeste, Rowe, and Smith* plaintiffs for leave to amend their complaints (collectively, the “**Motions to Amend**”). Copies of the October 1 Letter and the 10 Motions to Amend are annexed hereto as Exhibits “1” through “11” respectively.

¹ A copy of MDL Order No. 81 was previously provided to the Court by update letter dated September 25, 2015.

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2. On October 1, 2015, the Groman Plaintiffs filed with the Second Circuit Court of Appeals an *Unopposed Motion For Redesignation As Appellants And Memorandum In Support* ("**Redesignation Motion**"). A copy of the Redesignation Motion is attached hereto as Exhibit "12."
3. On October 2, 2015, counsel to New GM and Lead and Liaison Counsel filed a joint letter ("**Joint Agenda Letter**") addressed to Judge Furman setting forth the parties' tentative agenda for the October 9, 2015 status conference before Judge Furman. A copy of the Joint Agenda Letter is attached hereto as Exhibit "13."

Respectfully submitted,

/s/ *Scott Davidson*

Scott Davidson

AJS/sd
Encl.

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